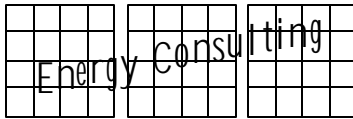


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bill mattinson sean plikuhn sarah pernula

March 27, 2003

Richard H. Karney, P.E.

Energy Star Window Program

United States Department of Energy

1000 Independence Avenue, SE

Washington, DC 20585

Re: Support for Three Zone Criteria

Dear Mr. Karney:

As a partner in the California Window Initiative and building code activities, I have been involved with promoting the use of better windows on behalf of California Investor Owned Utilities since the mid 1990's. I support adoption of the Three Zone Criteria.

I am pleased to see that both of the proposals recognize that products with a 0.40 U-factor and 0.40 SHGC (typically vinyl or wood frames with a low solar gain low e glass) make sense for a large portion of the country. We have been promoting this level of performance here in California since it is widely available and highly cost effective.

I am also pleased to see the boundary for improved U-factor products has been pushed much further south. Given the rapid rise of vinyl products in most Southern markets, this makes sense in reducing energy use for both heating and cooling compared to the existing Energy Star criteria.

While both proposals are improvements to the current Energy Star criteria, I believe that the Three Zone criteria makes the most sense overall:

1. To me, one of the strengths of the Energy Star marketing program is to keep it simple. Three zones is simpler than four plus the three zone proposal does a better job of following state boundaries.
2. In my opinion, the total benefits of low solar gain low e in terms of energy and peak demand savings outweigh the total benefits of higher solar gain products anywhere there is significant use of air conditioning, including the North/Central region.
3. As a practical matter, the low solar gain low e products also tend to have the lowest U-factors, making them more comfortable and efficient during the many hours of the day when the sun isn't shining or the orientation or shading of the window does not allow for passive solar gain. And very few homes are designed with passive solar in mind.
4. More of the country (both Southwest and Central) is in the 0.40 U-factor/0.40 SHGC region allowing the economies of scale to help lower the cost of these products to consumers.

I look forward to the implementation of the new Energy Star Window Criteria.

Sincerely,

Bill Mattinson

Partner, California Window Initiative